

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Congregation Khal Chasidim CG

**JOINT PROPOSED
CIVIL CASE MANAGEMENT PLAN**

Plaintiff(s),
-against-
Lefkowitz et al

Civ. 1:24-cv(07752) (VMS)

Defendant(s).
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The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s): Berman, Boyle & Engel LLC

For Defendant(s): Goldberg Weprin Finkel Goldstein LLP

- A. Do the parties request referral to the Court's ADR program? Yes: ☐ No: ☒
- B. Do the parties consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?
Yes: ☐ If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge>.
No: ☒ If no, do not indicate which party declines consent.
- C. The parties may wish to engage in settlement discussions.
If so, Plaintiff(s) will serve demand by . Defendant(s) will respond by .
- D. Defendant(s) will answer or otherwise respond to complaint by **March 24, 2025** , if not yet
The parties will serve Rule 26(a)(1) initial disclosures by **April 16, 2025** done. , if not yet
The parties will serve initial document requests and interrogatories on or before **April 16, 2025**
Any joinder and/or amendments of the pleadings must be made by **April 16, 2025**
The parties will complete fact discovery by **September 13, 2025**
If the parties perform expert discovery, they will serve initial disclosures by **October 13, 2025**
initial expert reports by **October 13, 2025** ; and rebuttal expert reports on or before .
All discovery, including expert depositions, will be completed by **November 12, 2025**, and the parties will file a joint letter certifying the close of all discovery by this same date.
- Other considerations the parties wish to bring to the Court's attention, such as the need for electronic discovery or confidentiality order: